

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

**JOHNNY S., a minor child, by and through his parents  
and next friends DARLENE R. and JUAN S.,**

**Plaintiff,**

**vs.**

**No. 1:13-CV-00027-MCA-KK**

**POJOAQUE VALLEY SCHOOL DISTRICT, et al.**

**Defendants.**

**PLAINTIFF'S UNOPPOSED MOTION TO SEAL PLAINTIFF'S RESPONSE TO  
DEFENDANTS' MOTION SUMMARY JUDGMENT [DOC NO 112] AND  
MEMORANDUM THEREOF**

COMES NOW Plaintiff, by and through counsel, THE LAW OFFICES OF NANCY L. SIMMONS, P.C. hereby submits his motion to seal Plaintiff's Response to Defendants' Motion for Summary Judgment and all exhibits attached to the Response. Counsel for Defendants has been contacted and does not oppose this Motion.

In support of this Motion, Plaintiff states that there is a Confidentiality Order entered in this case, allowing the parties to indicate records to be treated as confidential. Doc No. 112. Defendants' previously produced personnel records for Pojoaque Valley School District employees and asked that they be kept confidential.

The personnel records, and information derived from them, are easily identified because Defendants' names do not appear as acronyms in the case caption. Therefore, using acronyms throughout the document will not protect the identities of the parties. The only feasible way to keep the records confidential is to seal the Response and the exhibits.

**WHEREFORE**, Plaintiff prays the Court for an Order allowing him to seal Plaintiff's Response to Defendants' Motion for Summary Judgment and Memorandum Thereof.

Respectfully submitted,

THE LAW OFFICES OF NANCY L. SIMMONS, P.C.

Electronically submitted

Nancy L. Simmons

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Co-counsel for Plaintiffs

**Certificate of Service**

I hereby certify that on the 18<sup>th</sup> day of December 2014, I filed the foregoing electronically through the CM/ECF system, which caused all counsel to be served by electronic means, as more fully reflected on the Notice of Electronic Filing:

By: Electronically Signed

Nancy L. Simmons